

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA**

In re:	§	
	§	Chapter 7
	§	Case No. 24-30167
Pro-Mark Services, Inc.,	§	
	§	
Debtor.	§	
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Erik A. Ahlgren, as Chapter 7 trustee of Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust,	§	Adv. No. 24-07014
	§	
	§	
Plaintiff,	§	
	§	
	§	
v.	§	
	§	
Connie Berg, Kyle Berg, Connie Berg Revocable Living Trust, Kyle R. Berg Revocable Living Trust, and Miguel Paredes,	§	
	§	
	§	
Defendants.	§	
	§	

SCHEDULING AND DISCOVERY PLAN

Rule 16 of the Federal Rules of Civil Procedure as applied by Rule 7016 of the Federal Rules of Bankruptcy Procedure applies in this case. Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, counsel for the parties conferred on August 29, 2025 about discovery, the nature and basis of the parties' claims and defenses, the possibilities for a prompt settlement or resolution of the case and a proposed

Scheduling and Discovery Plan. This discussion included whether a mid-discovery status conference or a final pretrial conference would be helpful in this matter, whether the parties would seek discovery beyond the limits included in Rules 30 and 33, and whether a deadline to serve threshold motions, such as a motion to dismiss for lack of jurisdiction or expiration of a limitations period, should be included.

1. The Parties shall have until October 16, 2026 to complete fact discovery, including the resolution of all fact discovery motions.
2. Plaintiff shall have until November 20, 2027 to provide the names and complete disclosures and reports of any expert witnesses as required under Rule 26(a)(2).
3. Defendants shall have until February 19, 2027 to provide the names and complete disclosures and reports of any expert witnesses as required under Rule 26(a)(2).
4. Plaintiffs shall have until March 26, 2027 to provide any rebuttal expert reports.
5. The Parties shall have until May 7, 2027 to complete expert discovery.
6. The Parties shall have until May 21, 2027 to file dispositive motions.
7. The Parties anticipate that case will be trial-ready in January or February 2028.

Dated: September 8, 2025

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Attorneys for Plaintiff

Dated: September 8, 2025

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